December 21, 2015

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Ms. Brenda Scott-Henry
Department of Environmental Affairs - City of Gary
839 Broadway, 2nd Floor, NE
Gary, IN 46402

Subject: **4th Quarter 2015 NSPS Surface Emissions Monitoring (SEM)**
Gary Landfill – Gary, IN

Dear Brenda:

On December 15-16, 2015, Environmental Information Logistics LLC. (EIL) performed surface emissions monitoring at Gary Landfill. This event satisfies monitoring requirements for fourth quarter 2015 set forth by the USEPA New Source Performance Standards (NSPS), 40 CFR 60.775 (c) and (d) and 40 CFR 60, Appendix A, Method 21.

A Thermo Scientific TVA 100B vapor Analyzer PID/FID was used to perform the emissions monitoring. Only the instrument's FID mode was used. The FID was calibrated at the beginning of monitoring on each day in conformance with Method 21 requirements. Calibration logs are included in Attachment A.

Weather Conditions

The SEM event was performed during typical December weather conditions. Weather conditions for the 15th and 16th were as follows.

December 15th
- Overcast Skies
- Dry to wet ground
- Wind 0-5 mph out of the NE
- Temperature at approximately 40 degrees Fahrenheit

December 16th
- Overcast Skies, scattered light drizzle in morning
- Moist to wet ground
- Wind 5-10 mph out of the SW
- Temperature at approximately 37 degrees Fahrenheit

Monitoring Summary

An EIL field technician monitored the facility according to a route map which covers the entirety of the waste collection area in a serpentine pattern spaced 30 meters apart. The FID was held 8-10 centimeters off the ground in accordance with the Surface Emissions Monitoring plan. The route map was done in reverse to allow for observation of areas with dense vegetation from a high vantage point. Monitoring was not possible in some of these areas due to the excessive tall and dense vegetation. Areas where observations indicated the possibility for elevated emissions (where accessible) including but not limited to areas of distressed vegetation, gullies and exposed GCL were also monitored. A route map is included in Attachment B. A map of non-accessible areas is included in Attachment C.

Four exceedances at concentrations greater than 500 PPM above background were noted during the SEM. A table of exceedances and a map of exceedance locations are included in Attachment D.

If you have any questions, please call Andy or Ben at (630) 254-9382.

Sincerely,

Environmental Information Logistics, LLC

Andrew J. Querio, P.E.
Project Manager

Ben Wade
Environmental Scientist

Attachments:

- A- Field Calibration Logs
- B- Route Map
- C- Non-Accessible Areas
- D- Exceedance Summary
  - D-1: Summary Table
  - D-2: Location map
  - D-3: Exceedance form A-3
- E- Cover Integrity Inspection

Attachment A - Field Calibration Logs

Table A - 1
Sample Monitoring Instrument Performance Evaluation Form
Surface Monitoring Design Plan

40 CFR 60.755(d)(3) requires performance evaluation of response factor, response time and calibration precision according to 40 CFR 60 Appendix A, Method 21. The requirements are presented below along with locations to record the evaluations.

Response Factor:
Response factor is the ratio of the known concentration of a VOC compound to the observed meter reading when measured using an instrument calibrated with the reference compound specified in the applicable regulation. Since the monitoring instrument is being used to detect methane and the calibration reference compound is methane, the response factor by definition is one. No further evaluation is required.

Response Time:
Response time is the time interval from a step change in VOC concentration at the input of the sampling system to the time at which 9 percent of the corresponding final value is reached as displayed on the instrument readout meter.

Performance Requirement: Method 21 requires the instrument response time to be equal to or less than 30 seconds.

Evaluation Frequency: Prior to placing instrument into service (for the first time or after it was out of service for maintenance or repair). If modification to the sample pumping system or flow configuration is made that would change the response time, a new test is required prior to further use.

Evaluation Procedure: Calibrate instrument with the methane calibration gas. Introduce zero gas into the instrument sample probe. When the meter reading has stabilized, switch quickly to the specified calibration gas. Measure the time from switching to when 90 percent of the final stable reading is attained. Perform this test sequence three time and record the results. Calculate the average response time. Use the form below or a similar format to document this procedure.

Date:	12-15-15
Operator Name:	BEN WADE
Facility:	GARY LF
Instrument ID:	TVA-1000B
Calibration Gas Conc.:	500 PPM
90% of Calib. Gas Conc.:	450 PPM

Trial No.	Time to reach 90% gas value	
1	2.2	seconds
2	2.9	seconds
3	2.4	seconds
Average	2.5	seconds

Table A - 1
Sample Monitoring Instrument Performance Evaluation Form
Surface Monitoring Design Plan
(cont.)

Calibration Precision:

Calibration precision is the degree of agreement between measurements of the same known value, expressed as the relative percentage of the average difference between the meter readings and the known concentration to the known concentration.

Performance Requirement: The calibration precision must be equal to or less than 10 percent of the calibration gas value.

Evaluation Frequency: Must be completed prior to placing instrument into service, and at subsequent 3-month intervals or at the next use whichever is later.

Evaluation Procedure: Calibrate instrument with the methane calibration gas. Make a total of three measurements by alternately using zero gas and the specified calibration gas. Record the meter readings. Calculate the average algebraic difference between the meter readings and the known value. Divide this average difference by the known calibration value and multiply by 100 to express the resulting calibration precision as a percentage.

Date: 12-15-15
Operator Name: BEN WADE
Facility: GARY LF
Instrument ID: TVA-1000B
Calibration Gas Conc.: 500 ppm

Trial No.	Meter Reading After Zero Gas	Difference Between Calibration Gas and Meter Reading
1	496 ppm	4 ppm
2	515 ppm	15 ppm
3	490 ppm	10 ppm

Average Difference: 9.7 ppm

Calibration Precision = Average Difference/Calibration Gas Conc. X 100%
= 9.7 / 500 X 100%
= 1.94 %

Table A - 2
Sample Instrument Calibration and Monitoring Procedures Form
Surface Monitoring Design Plan

The calibration procedures in 40 CFR 60 Appendix A, Method 21 must be conducted immediately before commencing a surface monitoring survey. [40 CFR 60.755(d)(4)] Calibration, background readings and monitoring details can be recorded using this form.

Calibration Procedure:
The calibration gas should be methane in air at a nominal concentration of 500 ppm. [See Method 21 for further calibration gas requirements.]

Assemble and start up the analyzer according to the manufacturer's instructions. After the appropriate warm-up period and zero internal calibration procedure, introduce the calibration gas into the instrument sample probe. Adjust the instrument meter readout to correspond to the calibration gas value. Record the calibration information in the table below.

Background Concentration:
Determine the background concentration by moving the probe inlet upwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells. Record the background concentration and location in the table below.

General Information:
Date: 12-15-15
Operator Name: BEN WADE
Facility: GARY LF
Instrument ID: _____
Wind Direction: N (NE) E SE S SW W NW (circle one)
Approximate Wind Speed 0-5 mph
General Weather: 40 °F,
clear, partly cloudy, (overcast), _____ (circle one or write in)
(no precip.), drizzle, rain, snow, _____ (circle one or write in)

Calibration Information:
Calibration Gas Conc.: 500 ppm
Conduct internal zero calibration? (Yes) No (circle one)
Instrument reading after calibration: 500 ppm (should be same as above)
Time of Calibration: 10:20 (am) pm (fill in and pick one)

Background Concentration Information:
Background concentration upwind of site: ~10 ppm
Background concentrations downwind of site: ~7 ppm

Location of background readings: outside NE gate, outside SW corner of site

Table A - 1
Sample Monitoring Instrument Performance Evaluation Form
Surface Monitoring Design Plan

40 CFR 60.755(d)(3) requires performance evaluation of response factor, response time and calibration precision according to 40 CFR 60 Appendix A, Method 21. The requirements are presented below along with locations to record the evaluations.

Response Factor:
Response factor is the ratio of the known concentration of a VOC compound to the observed meter reading when measured using an instrument calibrated with the reference compound specified in the applicable regulation. Since the monitoring instrument is being used to detect methane and the calibration reference compound is methane, the response factor by definition is one. No further evaluation is required.

Response Time:
Response time is the time interval from a step change in VOC concentration at the input of the sampling system to the time at which 9 percent of the corresponding final value is reached as displayed on the instrument readout meter.

Performance Requirement: Method 21 requires the instrument response time to be equal to or less than 30 seconds.

Evaluation Frequency: Prior to placing instrument into service (for the first time or after it was out of service for maintenance or repair). If modification to the sample pumping system or flow configuration is made that would change the response time, a new test is required prior to further use.

Evaluation Procedure: Calibrate instrument with the methane calibration gas. Introduce zero gas into the instrument sample probe. When the meter reading has stabilized, switch quickly to the specified calibration gas. Measure the time from switching to when 90 percent of the final stable reading is attained. Perform this test sequence three time and record the results. Calculate the average response time. Use the form below or a similar format to document this procedure.

Date:	12-16-15
Operator Name:	B. WADE
Facility:	GARY CF
Instrument ID:	TVA-1000B
Calibration Gas Conc.:	500 ppm
90% of Calib. Gas Conc.:	450 ppm

Trial No.	Time to reach 90% gas value
1	1.9 seconds
2	2.3 seconds
3	2.5 seconds
Average	2.2 seconds

Table A - 1
Sample Monitoring Instrument Performance Evaluation Form
Surface Monitoring Design Plan
(cont.)

Calibration Precision:

Calibration precision is the degree of agreement between measurements of the same known value, expressed as the relative percentage of the average difference between the meter readings and the known concentration to the known concentration.

Performance Requirement: The calibration precision must be equal to or less than 10 percent of the calibration gas value.

Evaluation Frequency: Must be completed prior to placing instrument into service, and at subsequent 3-month intervals or at the next use whichever is later.

Evaluation Procedure: Calibrate instrument with the methane calibration gas. Make a total of three measurements by alternately using zero gas and the specified calibration gas. Record the meter readings. Calculate the average algebraic difference between the meter readings and the known value. Divide this average difference by the known calibration value and multiply by 100 to express the resulting calibration precision as a percentage.

Date: 12-16-15
Operator Name: B. WADE
Facility: GARY LF
Instrument ID: TVA-1000B
Calibration Gas Conc.: 500 ppm

Trial No.	Meter Reading After Zero Gas	Difference Between Calibration Gas and Meter Reading
1	499 ppm	1 ppm
2	490 ppm	10 ppm
3	493 ppm	7 ppm

Average Difference: 6 ppm

Calibration Precision = Average Difference/Calibration Gas Conc. X 100%
= 6 / 500 X 100%
= 1.2 %

Table A - 2
Sample Instrument Calibration and Monitoring Procedures Form
Surface Monitoring Design Plan

The calibration procedures in 40 CFR 60 Appendix A, Method 21 must be conducted immediately before commencing a surface monitoring survey. [40 CFR 60.755(d)(4)] Calibration, background readings and monitoring details can be recorded using this form.

Calibration Procedure:
The calibration gas should be methane in air at a nominal concentration of 500 ppm. [See Method 21 for further calibration gas requirements.]

Assemble and start up the analyzer according to the manufacturer's instructions. After the appropriate warm-up period and zero internal calibration procedure, introduce the calibration gas into the instrument sample probe. Adjust the instrument meter readout to correspond to the calibration gas value. Record the calibration information in the table below.

Background Concentration:
Determine the background concentration by moving the probe inlet upwind outside the boundary of the landfill at a distance of at least 30 meters from the perimeter wells. Record the background concentration and location in the table below.

General Information:
Date: 12-16-15
Operator Name: B. WADE
Facility: GARF LF
Instrument ID: TVA-1000B
Wind Direction: N NE E (SE) S SW W NW (circle one)
Approximate Wind Speed 5-10 mph
General Weather: 37 °F,
clear, partly cloudy, (overcast), _____ (circle one or write in)
no precip., (drizzle), rain, snow, _____ (circle one or write in)

Calibration Information:
Calibration Gas Conc.: 500 ppm
Conduct internal zero calibration? (Yes) No (circle one)
Instrument reading after calibration: 500 ppm (should be same as above)
Time of Calibration: 8 : 00 (am) pm (fill in and pick one)

Background Concentration Information:
Background concentration upwind of site: -3 ppm
Background concentrations downwind of site: -6 ppm

Location of background readings: outside NE gate, outside SW corner of LF

Attachment B - Route Map

LEGEND

- 241,000 N — GRID COORDINATES
- PROPERTY BOUNDARY
- 450 — EXISTING 10' CONTOUR
- EXISTING 2' CONTOUR
- X 455.9 — EXISTING SPOT ELEVATION
- EXISTING TREE LINE
- EXISTING BUSH
- GM-3A — MONITORING WELL LOCATION
- GP-1 — GAS PROBE LOCATION
- SURFACE SCAN ROUTE

EXISTING CLAY DIKE

EXISTING CLAY CUTOFF WALL

EXISTING CLAY CUT-OFF WALL

CALHOUN STREET

TOMPKINS STREET

GERRY STREET

CLINTON STREET

COLFAX AVENUE

BURR STREET

ENTRANCE ROAD

START

END

MAINTENANCE BUILDING

SCALE HOUSE

SCALE

EXISTING SLURRY WALL

EXISTING SLURRY WALL

2500 E 3000 E 3500 E 4000 E 4500 E 5000 E

7000 N 6500 N 6000 N 5500 N 5000 N

0' 50' 100' 200'
APPROXIMATE SCALE

NOTES

1. BASE MAP SHOWN PROVIDED BY WEAVER BOOS & GORDON, INC., DATED MARCH 17, 1999.
2. ELEVATIONS ARE PRE-CLOSURE ELEVATIONS.

EARTH TECH

GARY SANITARY LANDFILL
GARY, INDIANA

SURFACE SCAN ROUTE PLAN

DATE	AUGUST 2000
PROJECT NO	
FILENAME	GARY.DGN
SHEET NO	1 OF 1
DRAWING NO	1

DRN CHK DATE — REVISIONS — NO

Attachment C - Non-Accessible Areas Map

LEGEND

- 241,000 N — GRID COORDINATES
- PROPERTY BOUNDARY
- 450 — EXISTING 10' CONTOUR
- EXISTING 2' CONTOUR
- x 455.8 — EXISTING SPOT ELEVATION
- EXISTING TREE LINE
- EXISTING BUSH
- CM-3A — MONITORING WELL LOCATION
- GP-1 — GAS PROBE LOCATION
- SURFACE SCAN ROUTE

= AREA NOT MONITORED

CALHOUN STREET
TOMPKINS STREET
GERRY STREET
CLINTON STREET
COLFAX AVENUE
BURR STREET
EXISTING CLAY DIKE
EXISTING CLAY CUTOFF WALL
EXISTING CLAY CUT-OFF WALL
EXISTING SLURRY WALL
START
END
ENTRANCE ROAD
DRIVEWAY ROAD
MAINTENANCE BUILDING
SCALE HOUSE
7000 N
6500 N
6000 N
5500 N
5000 N
2500 E
3000 E
3500 E
4000 E
4500 E
5000 E

0' 50' 100' 200'
APPROXIMATE SCALE

NOTES

1. BASE MAP SHOWN PROVIDED BY WEAVER BOOS & GORDON, INC., DATED MARCH 17, 1999.
2. ELEVATIONS ARE PRE-CLOSURE ELEVATIONS.

REVISIONS	NO	DATE	DRN	CHK

DRN
DES
CHK
APP

EARTH TECH

GARY SANITARY LANDFILL
GARY, INDIANA

SURFACE SCAN ROUTE PLAN

DATE AUGUST 2000
PROJECT NO
FILENAME GARY.DGN
SHEET NO 1 OF 1
DRAWING NO 1

Attachment D – Exceedance Summary

D-1: Summary Table

D-2: Location Map

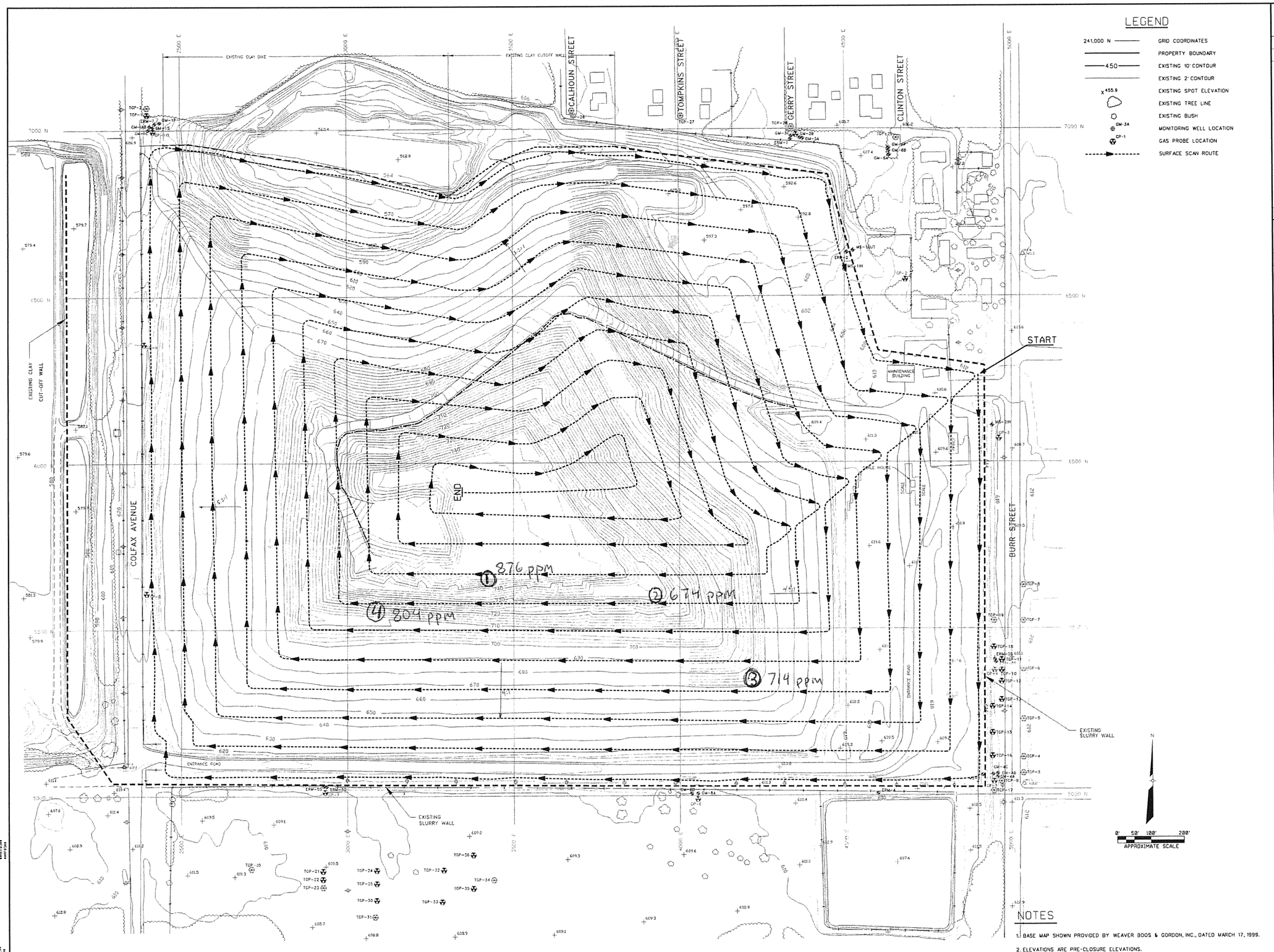
D-3 Exceedance Form A-3

D-1: Summary Table

Exceedance Summary			
Exceedance	Date and Time	Concentration in PPM	Location
1	12/15/2015 11:26	876	~300’ WSW of flare #3 in tall vegetation
2	12/15/2015 12:00	674	~200’ SE of #2 and ~200’ WNW of flare #4
3	12/16/2015 10:30	714	~300’ SE of flare #18
4	12/16/2015 12:12	804	~50’ NE of Well #13

*Exceedance locations are marked with double orange survey flags. Sets of four flags visible from referenced flares and well locations point to the Exceedance location.
*locations are plotted on attached map

D-2 Exceedance Location Map


LEGEND
241,000 N — GRID COORDINATES
PROPERTY BOUNDARY
450 — EXISTING 10' CONTOUR
EXISTING 2' CONTOUR
455.9 — EXISTING SPOT ELEVATION
EXISTING TREE LINE
EXISTING BUSH
GM-3A — MONITORING WELL LOCATION
CP-1 — GAS PROBE LOCATION
SURFACE SCAN ROUTE
EXISTING CLAY DIKE
EXISTING CLAY CUTOFF WALL
CALHOUN STREET
TOMPKINS STREET
GERRY STREET
CLINTON STREET
BURR STREET
COLFAX AVENUE
EXISTING CLAY CUT-OFF WALL
START
END
1 876 ppm
2 674 ppm
3 714 ppm
4 804 ppm
MAINTENANCE BUILDING
SCALE HOUSE
ENTRANCE ROAD
EXISTING SLURRY WALL
EXISTING SLURRY WALL
7000 N
6500 N
6000 N
2500 E
3000 E
3500 E
4000 E
4500 E
5000 E
0' 50' 100' 200'
APPROXIMATE SCALE
NOTES
1. BASE MAP SHOWN PROVIDED BY WEAVER BOOS & GORDON, INC., DATED MARCH 17, 1999.
2. ELEVATIONS ARE PRE-CLOSURE ELEVATIONS.
EARTH TECH
GARY SANITARY LANDFILL
GARY, INDIANA
SURFACE SCAN ROUTE PLAN
DATE AUGUST 2000
PROJECT NO
FILENAME GARY.DGN
SHEET NO 1 OF 1
DRAWING NO 1
DRN
DES
CHK
APP
NO
REVISIONS
DRN CHK
DATE

D-3 Exceedance form A-3

Table A - 3
Sample Individual Monitoring Exceedance Form
Surface Monitoring Design Plan

Use this form to record an individual monitoring exceedance and follow-up monitoring activities. This form is only used when a reading of 500 ppm above background is encountered during the surface monitoring. Use a separate form for each initial exceedance.

Initial Monitoring Exceedance:
Date: 12-15 Time: 11:26 (am) pm Monitoring Technician Initials: BW
Instrument reading - Background reading: 866 ppm - -10 ppm = 876 ppm

Location of monitored exceedance (include description of field marker used):
Location 1, orange flags, 300' WSW of flare #3
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days:

Remonitor location within 10 calendar days of initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

If the 10 day remonitoring is <500 ppm, remonitor 1 month from initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 1 month remonitoring is <500 ppm, resume normal quarterly monitoring.
If the 1 month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

Remonitor location within 10 calendar days of 2nd exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 10 day remonitoring is <500 ppm, remonitor 1 month from initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 1 month remonitoring is <500 ppm, resume normal quarterly monitoring.
If the 1 month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

(use additional forms if necessary)*

*If remonitoring shows 3 consecutive exceedances within a quarterly period a new well or other collection device must be installed within 120 days of initial exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.

Table A - 3
Sample Individual Monitoring Exceedance Form
Surface Monitoring Design Plan

Use this form to record an individual monitoring exceedance and follow-up monitoring activities. This form is only used when a reading of 500 ppm above background is encountered during the surface monitoring. Use a separate form for each initial exceedance.

Initial Monitoring Exceedance:
Date: 12-15 Time: 12:00 am (pm) Monitoring Technician Initials: BW
Instrument reading - Background reading: 664 ppm - -10 ppm = 674 ppm

Location of monitored exceedance (include description of field marker used):
Location 2, orange flags, 200' SE #2, 200' WNW #4
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days:

Remonitor location within 10 calendar days of initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

If the 10 day remonitoring is <500 ppm, remonitor 1 month from initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 1 month remonitoring is <500 ppm, resume normal quarterly monitoring.
If the 1 month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

Remonitor location within 10 calendar days of 2nd exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 10 day remonitoring is <500 ppm, remonitor 1 month from initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 1 month remonitoring is <500 ppm, resume normal quarterly monitoring.
If the 1 month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

(use additional forms if necessary)*

*If remonitoring shows 3 consecutive exceedances within a quarterly period a new well or other collection device must be installed within 120 days of initial exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.

Table A - 3
Sample Individual Monitoring Exceedance Form
Surface Monitoring Design Plan

Use this form to record an individual monitoring exceedance and follow-up monitoring activities. This form is only used when a reading of 500 ppm above background is encountered during the surface monitoring. Use a separate form for each initial exceedance.

Initial Monitoring Exceedance:
Date: 12-16 Time: 10:30 (am) pm Monitoring Technician Initials: PW
Instrument reading - Background reading: 708 ppm - -6 ppm = 714 ppm

Location of monitored exceedance (include description of field marker used):
Location 3, orange flags, ~300' SE of #18
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days:

Remonitor location within 10 calendar days of initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

If the 10 day remonitoring is <500 ppm, remonitor 1 month from initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 1 month remonitoring is <500 ppm, resume normal quarterly monitoring.
If the 1 month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

Remonitor location within 10 calendar days of 2nd exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 10 day remonitoring is <500 ppm, remonitor 1 month from initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 1 month remonitoring is <500 ppm, resume normal quarterly monitoring.
If the 1 month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

(use additional forms if necessary)*

*If remonitoring shows 3 consecutive exceedances within a quarterly period a new well or other collection device must be installed within 120 days of initial exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.

Table A - 3
Sample Individual Monitoring Exceedance Form
Surface Monitoring Design Plan

Use this form to record an individual monitoring exceedance and follow-up monitoring activities. This form is only used when a reading of 500 ppm above background is encountered during the surface monitoring. Use a separate form for each initial exceedance.

Initial Monitoring Exceedance:
Date: 12-16 Time: 12:12 am (pm) Monitoring Technician Initials: BW
Instrument reading - Background reading: 798 ppm - -6 ppm = 804 ppm

Location of monitored exceedance (include description of field marker used):
location 4, orange flags, ~50' NE #13
Describe cover maintenance or adjustments to the vacuum of adjacent wells to increase gas collection in vicinity of measured exceedance before remonitoring in 10 days:

Remonitor location within 10 calendar days of initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If 10 day remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

If the 10 day remonitoring is <500 ppm, remonitor 1 month from initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 1 month remonitoring is <500 ppm, resume normal quarterly monitoring.
If the 1 month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

Remonitor location within 10 calendar days of 2nd exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 10 day remonitoring is <500 ppm, remonitor 1 month from initial exceedance:
Date: _____ Time:_____am pm Monitoring Technician Initials:_____
Instrument reading - Background reading: _____ppm - _____ppm = _____ppm

If the 1 month remonitoring is <500 ppm, resume normal quarterly monitoring.
If the 1 month remonitoring shows an exceedance, describe additional corrective action taken before remonitoring again within 10 days:

(use additional forms if necessary)*

*If remonitoring shows 3 consecutive exceedances within a quarterly period a new well or other collection device must be installed within 120 days of initial exceedance or alternative remedies/timelines may be submitted to the Administrator for approval. Further monitoring is not necessary until the remedy is completed.

Attachment E – Cover Integrity Inspection

Table A - 4
Sample Monthly Cover Integrity Inspection Form
Surface Monitoring Design Plan

Month	Inspection Date	Inspector Initials	Cover Integrity Problems Found During Inspection
January	___/___/___		
February	___/___/___		
March	___/___/___		
April	___/___/___		
May	___/___/___		
June	___/___/___		
July	___/___/___		
August	___/___/___		
September	___/___/___		
October	___/___/___		
November	___/___/___		
December	12/16/15	BW	-Exceedingly tall + dense vegetation -Areas with no vegetative cover -Areas with exposed GCL and erosion